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June 24, 2025

**Via ECF**

Hon. Edgardo Ramos  
United States District Court for the Southern  
District of New York  
40 Foley Square  
New York, New York 10007

**Re: *Smith et al. vs. Giuliani*, No. 1:24-mc-00351-ER (S.D.N.Y.)**

Dear Judge Ramos,

We write on behalf of Movants in the above-captioned enforcement proceeding concerning a non-party subpoena duces tecum (“the Subpoena”) served on Respondent Rudolph Giuliani.

Movants’ September 10, 2024 motion to compel Mr. Giuliani’s compliance with the Subpoena (ECF No. 11) remains “unopposed, fully briefed, and ripe for decision.” *See* ECF No. 18 (Movants’ letter submitted as a reply brief on October 8, 2024); Order, ECF No. 19 (entered Oct. 9, 2024). Mr. Giuliani has failed to appear in this proceeding in any capacity.

Accordingly, Movants respectfully request that Your Honor convene a status conference to discuss the pending motion. Movants are available to meet either remotely or in-person at the Court’s convenience.

Respectfully submitted,



Joshua S. Margolin  
Partner